

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

THE M/Y *AMADEA*, A MOTOR YACHT  
BEARING INTERNATIONAL MARITIME  
ORGANIZATION NO. 1012531,  
INCLUDING ALL FIXTURES, FITTINGS,  
MANUALS, STOCKS, STORES,  
INVENTORIES, AND EACH LIFEBOAT,  
TENDER, AND OTHER  
APPURTENANCE THERETO,

Defendant-*In-Rem*,

and

EDUARD YURIEVICH KHUDAINATOV,  
MILLEMARIN INVESTMENTS LTD.,

Claimants.

Case No. 1:23-cv-09304

The Honorable Dale E. Ho

**ORAL ARGUMENT REQUESTED**

**NOTICE OF CLAIMANTS' MEMORANDUM OF LAW  
IN SUPPORT OF MOTION TO DISMISS**

**PLEASE TAKE NOTICE** that upon the memorandum in support of this motion, Claimants Eduard Yurievich Khudainatov and Millemarin Investments Ltd. hereby moves this Court, before the Honorable Dale E. Ho, United States District Court for the Southern District of New York, 40 Foley Square, New York, New York 10007, to dismiss Plaintiff's Verified Complaint for Forfeiture pursuant to F.R.C.P. Rule 12(b)(6) and Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions E and G.

Dated: January 26, 2024

Respectfully submitted,

FORD O'BRIEN LANDY LLP

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